

## **AFFIDAVIT**

I, Alan M. Book, a Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, depose and state:

### **INTRODUCTION**

1. I am a Postal Inspector with the United States Postal Inspection Service, in Tucson, AZ, and have been employed as such since September of 2016. Since December 2016, I have been stationed at the Tucson, Arizona office of the Phoenix Division. I attended the twelve-week training course at the United States Postal Inspection Service Academy in Potomac, MD. There I received training related to violations of federal law including assaults, robberies, and criminal investigations of narcotics trafficking via the United States Mail. Prior to becoming a Postal Inspector, I was employed as a United States Border Patrol Agent for approximately 5 years. Throughout my law enforcement career, I have had extensive training and experience investigating a variety of criminal violations including controlled substances. On September 15, 2017 I successfully completed a 40 hour training course on Prohibited Mailings and Narcotics. On September 15, 2017, I also completed the Narcotics Identification Competency Level Course.

2. I am currently working with Inspector Ethan A. Paszko, who has conducted hundreds of criminal investigations throughout his career and who, since 2012, has conducted over one hundred investigations involving the mailing of narcotics and/or the money derived from the sale of narcotics. Inspector Paszko has obtained in excess of one hundred federal search warrants for United States Mail parcels and letters. Postal Inspectors in Tucson routinely work with each other to identify and interdict suspected narcotics parcels.

### **DESCRIPTION OF SUBJECT PARCEL**

3. This affidavit is made in support of an application for a search warrant for two United States Priority Mail parcel in connection to mailing a controlled substance. The Subject Parcels are described as:

**SP1:** USPS Priority Mail parcel with USPS Tracking Number 9505 1125 8891 2111 5213 54, bearing \$5.10 in postage, postmarked from Nogales, AZ 85621 on April 21, 2022. It bears a return address of "Gerardo Perez, 1068 West Paul Bond Dr, Apt 6 # 103." and is addressed to "Chris Gomez, 7726 East Highway 287 # 23, Coolidge, AZ 85128." The parcel consists of a Priority Mail envelope, weighing approximately, 4.3 ounces, measuring approximately 6" X 10."

**SP2:** USPS Priority Mail parcel with USPS Tracking Number 9505 1125 8891 2111 5213 47, bearing \$5.00 in postage, postmarked from Nogales, AZ 85621 on April 21, 2022. It

bears a return address of "Gerardo Perez, 1068 West Paul Bond Dr, Apt 6 # 103." and is addressed to "Tommy Kern, 701 Daffodil Lane, Durham, NC 27712." The parcel consists of a Priority Mail envelope, weighing approximately, 2.4 ounces, measuring approximately 6" X 10."

These brown Priority Mail parcels are hereinafter referred to as "SUBJECT PARCEL 1 and 2."

**BACKGROUND ON USPS DRUG INTERDICTION IN SOUTHERN ARIZONA AND THE USPS  
DRUG MAIL PROFILING PROGRAM**

4. Based upon my training, personal experience, and the collective experiences relayed to me by other Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and the proceeds from sales of controlled substances, I am aware that the Southern Arizona international border is a leading area of the United States for the entry of controlled substances from Mexico. Based on the large quantities of controlled substances entering Southern Arizona, controlled substances are frequently transported from Southern Arizona via the United States Mail to metropolitan areas across the United States, primarily to the eastern United States and Puerto Rico. It is also common for the proceeds from the sale of the controlled substances to be sent to Southern Arizona via the United States Mail. By using the U.S. Mail to ship a controlled substance, drug traffickers place a significant risk on unknowing postal employees who handle and deliver those mailings.

5. Based on the frequent use of the United States Mail for the shipment of controlled substances from Southern Arizona, Postal Inspectors in Tucson routinely profile outbound mail articles for suspicious characteristics common to drug parcels. While there are many characteristics that experienced inspectors look for, the most common characteristics found are:

a. Parcels typically weighing between 1 to 30 pounds and sized accordingly, often with a solid center of mass, that are varying in color but usually brown or white, often with excessive tape and sometimes with an odor consistent with a purposeful effort to mask an odor of a controlled substance, or with the odor of a controlled substance itself.

b. Suspected drug parcels are addressed to known drug destination areas, primarily to the large metropolitan areas in the eastern half of the United States and Puerto Rico.

c. The sender names and addresses on drug parcels routinely contain fictitious names, misspellings, or incomplete, inaccurate, and/or unauthorized information. From my experience I know that drug mailers utilize false addressing to remain anonymous, whereas it is extremely rare for a legitimate mailer to use false addressing or to leave out a name.

d. A tracking number is used to provide the trafficker the ability to track the parcel's progress to the point of delivery.

e. The postage was paid with cash which leaves no trail identifying the sender.

Parcels found to meet all of the suspicious characteristics described in subsections a through d of this paragraph are further investigated by Postal Inspectors.

### **INVESTIGATIVE DETAILS**

6. On April 21, 2022, another federal law enforcement agency contacted Postal Inspectors regarding a suspect involved in an ongoing narcotics investigation. Postal Inspectors were informed the suspect had mailed two parcels from Nogales, AZ. Postal Inspectors obtained the parcels for further investigation.

7. The SUBJECT PARCELS revealed the following characteristics of drug parcels:

The size, shape, weight, and color of the SUBJECT PARCELS were all consistent with packages involved in illegal narcotics trafficking. In addition, the SUBJECT PARCELS had a solid center of mass with little or no movement, again indicative of illegal narcotics.

I reviewed records from "CLEAR-Thompson Reuters" (an on-line data base program used by law enforcement for address verifications, business searches and person searches) and USPS address records to check for records of the sender and addressee name and address on the SUBJECT PARCEL 1. Record checks revealed that the return addresses listed on the parcel did not return to a "Gerardo Perez".

I reviewed records from "CLEAR-Thompson Reuters" (an on-line data base program used by law enforcement for address verifications, business searches and person searches) and USPS address records to check for records of the sender and addressee name and address on the SUBJECT PARCEL 2. Record checks revealed that the return addresses listed on the parcel did not return to a "Gerardo Perez".

SUBJECT PARCELS 1 and 2 bear a tracking number. In my experience nearly all drug parcels have tracking numbers which drug mailers routinely check to follow the progress of the parcels to their destination.

a. The SUBJECT PARCELS have a solid center of mass with little or no movement which is extremely common for drug related parcels.

b. The SUBJECT PARCELS are destined for North Carolina and Coolidge AZ, which is a common drug and drug proceeds destination.

**CANINE EXAMINATION PERFORMED WITH POSITIVE RESULTS**

8. On April 26, 2022, at approximately 11:15 a.m., I met with Officer Gabe Tapia of the Marana Police Department and his narcotics canine partner Axle. Officer Tapia's canine is trained and certified to detect the odors of marijuana, heroin, cocaine, and methamphetamine. I placed SUBJECT PARCEL 1 in a cleared area for examination by Officer Tapia and Axle. Officer Tapia informed me at 11:20 a.m. that Axle had positively alerted to SUBJECT PARCEL 1, indicating the presence of narcotics or a controlled substance, or other evidence with an odor of narcotics or a controlled substance within the parcel. I placed SUBJECT PARCEL 2 in a cleared area for examination by Officer Tapia and Axle. Officer Tapia informed me at 11:23 a.m. that Axle had positively alerted to SUBJECT PARCEL 2, indicating the presence of narcotics or a controlled substance, or other evidence with an odor of narcotics or a controlled substance within the parcel.

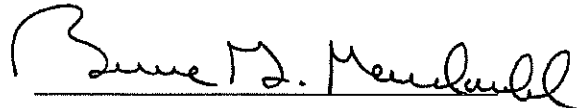
9. Based on the facts set forth in this affidavit, I believe there is probable cause to show that the SUBJECT PARCEL referenced to in this affidavit contains controlled substances, constituting evidence of violations of Title 21, United States Code, Sections 841 (a)(1), Possession with Intent to Distribute a Controlled Substance, and 843 (b), Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance. I respectfully request that a warrant be issued to search for evidence of the above violations.



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Alan M. Book  
United States Postal Inspector

Subscribed and sworn to telephonically  
this 26<sup>th</sup> of April 2022.



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Bruce G. Macdonald  
United States Magistrate Judge